

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

BRIAN GREENE, et al.

**Plaintiffs,**

**V.**

**AB COASTER HOLDINGS, INC.**

**Defendant.**

**AB COASTER HOLDINGS, INC.**

**Plaintiff,**

V.

BRIAN GREENE, et al.

### Defendants.

**DEFENDANT AB COASTER HOLDINGS, INC.'S CERTIFICATION  
OF COMPLIANCE WITH DISCOVERY REQUIREMENTS**

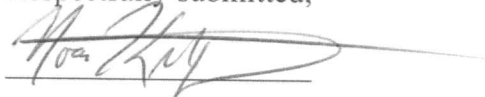
Defendant Ab Coaster Holdings, Inc. ("Ab Coaster," "Defendant," or "Counterclaim Plaintiff,"), by its undersigned attorneys, hereby certifies as follows:

Ab Coaster has taken appropriate action in responding to Plaintiff's discovery requests, including conferring with the individuals deemed most likely to have the information and/or documents sought, reviewing all files, including paper and electronic files, within the company's possession for relevant and responsive information and/or documents, and requesting third parties to provide any responsive information and/or documents where necessary. As a result of this process, Ab Coaster has provided proper general and specific objections to each and every interrogatory as warranted, and has further provided adequate responses to each and every discovery request. Ab Coaster has provided a Privilege Log containing a description of

documents withheld due to asserted privilege(s). Ab Coaster has supplemented, and continues to supplement its discovery responses periodically in accordance with Federal Rule of Civil Procedure 26(e).

Ab Coaster certifies that by virtue of the actions described above, its discovery responses are, to the best of its knowledge, information, and belief, (1) complete and correct as of the time they were made; (2) consistent with Rule 26 of the Federal Rules of Civil Procedure and warranted by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law, or for establishing new law; (3) not interposed for any improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation, and (4) neither unreasonable nor unduly burdensome or expensive, considering the needs of the case, prior discovery in the case, the amount in controversy, and the importance of the issues at stake in the action.

Dated: October 14, 2011

Respectfully submitted,  
By: 

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